

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CASE NO.: 1:19-cv-07112-VSB

SID AVERY AND ASSOCIATES, INC.
DBA MPTV IMAGES,

Plaintiff,

v.

PARALLEL BAR INC. DBA THE SUMMIT
BAR, HAMID RASHIDZADA, AND GREG
SEIDER,

Defendants.

The Order to Show Cause hearing scheduled for Thursday
February 20, 2020, is adjourned to March 13, 2020 at 11:30
a.m.

SO ORDERED:


HON. VERNON S. BRODERICK 2/18/2020
UNITED STATES DISTRICT JUDGE

MOTION FOR ADJOURNMENT

Plaintiff SID AVERY AND ASSOCIATES, INC. DBA MPTV IMAGES by and through its undersigned counsel, hereby moves this Honorable Court for an Adjournment Hearing on Default scheduled for February 2020, at the Court's Convenience after March 1, 2020, and as grounds therefore states as follows:

1. Plaintiff's Counsel Joseph A Dunne will be traveling and in Florida on February 20, 2020.
2. Defendant has failed to appear in this case, and has likewise failed to respond to the Court's January 20, 2020 Order to Show Cause.
3. Plaintiff requests adjournment until after March 1, 2020, at the Court's convenience.
4. In the alternative, in the light of the Statutory Damages nature of this case, Plaintiff respectfully submits that the entire Default Motion would be properly done on paper,

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and that a hearing is not needed, unless the court find a hearing necessary after reviewing Plaintiff's Damages submissions and request. Accordingly, Plaintiff request that its request for Clerk's Default be granted, and upon issuance of the Clerk's Default, Plaintiff be provided three (3) weeks to submit a full Default Motion, and damage request.

WHEREFORE, Plaintiff SID AVERY AND ASSOCIATES, INC. DBA MPTV IMAGES prays this Honorable Court for the adjournment of the February 20, 2020 Hearing.

DATED: February 16, 2020

Respectfully submitted,

/s/ Joseph A. Dunne

JOSEPH A. DUNNE (JD0674)

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*Counsel for Plaintiff Sid Avery and Associates, Inc.
dba MPTV Images*

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on February 16, 2020, a true and correct copy of the foregoing document was served by electronic mail to all parties listed below on the Service List.

/s/ Joseph A. Dunne

JOSEPH A. DUNNE

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